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4/20/05

STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

DIF

ELIOT SPITZER  
Attorney General

(212) 416-8567

RICHARD RIFKIN  
Deputy Attorney General  
State Counsel Division

April 19, 2005

**BY HAND**

Honorable Raymond J. Dearie  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Court grants a 60 day  
extension for defendant to  
respond; defendant shall  
respond by  
Tuesday June 21, 2005.

JAMES B. HENLY  
Assistant Attorney General in Charge  
Litigation Bureau

**RECORDED**

Dated: Brooklyn, New York

April 21, 2005

Re: Memblatt v. Hon. Jaime A. Rios  
05 CV 1021 (RJD) (LB)

s/ Judge Raymond J. Dearie

Dear Judge Dearie:

**RAYMOND J. DEARIE**  
United States District Judge

This office represents defendants the Honorable Jaime A. Rios, the Honorable Steven W. Fisher, Anthony D'Angelis, Roberk W. Gardner, Sandra Newsome, and Heidi Higgins (collectively "State defendants") in the above-referenced action. In addition, this office anticipates representing the Honorable Jonathan Lippman and Lauren DeSole once they are served and have requested representation.

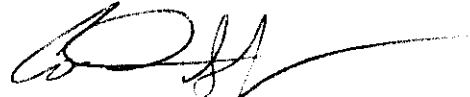
I write to request a ninety (90) day extension of time to respond to the complaint. Plaintiff pro se has advised this office that she would not consent to any requests for additional time to respond to the complaint. No prior request for an extension has been made.

This extension of time is necessary to allow this office time to review the complaint, which is ninety three (93) pages plus exhibits and contains two hundred sixty five (265) paragraphs, with each of the State defendants and prepare a proper response for each party. This extension will also allow this office to review any relevant records. Accordingly, it is respectfully requested that State defendants be granted a ninety (90) day extension of time to respond to the complaint.

Hon. Raymond J. Dearie  
April 19, 2005  
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Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. Speres', with a long horizontal flourish extending to the right.

Constantine A. Speres (CAS-9100)  
Assistant Attorney General

cc. Judith B. Memblatt (Via Express Mail)

Honorable Lois Bloom (By Hand)  
United States Magistrate Judge

Madeleine S. Egelfeld, Esq. (Via Express Mail)  
Attorney for Defendant Koslowitz